

# **Exhibit 29**

## **(Excerpt)**

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1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF VIRGINIA

3 ALEXANDRIA DIVISION

4 - - - - - - - - - - - - - - - x

5 UNITED STATES, et al., :  
Plaintiffs, :  
v. : Case No.

6 GOOGLE, LLC, : 1:23-cv-00108  
Defendant. :  
- - - - - - - - - - - - - - - x

7  
8  
9 Monday, March 4, 2024

10 Washington, D.C.  
11

12 Job No. CS6484199

13 Videotaped Deposition of:

14 WAYNE D. HOYER, Ph.D.,  
called for oral examination by counsel for the

15 Defendant, pursuant to notice, at the United States

16 Department of Justice, Antitrust Division, 450 Fifth

17 Street, Northwest, Suite 11-248, Washington,

18 D.C. 20001, before Christina S. Hotsko, RPR, CRR, of

19 Veritext Legal Solutions, a Notary Public in and for

20 the District of Columbia, beginning at 8:33 a.m.,

21 when were present on behalf of the respective

22 parties:

1           Q. And when I -- I should have clarified.  
2                   Do you understand what the term "ad tech"  
3 means?

4           A. I do.

5           Q. What is your understanding of that term?

6           A. Ad tech is the different tools to buy  
7 advertising for display -- programmatic display  
8 advertising.

9           Q. Okay. And again, you've never conducted  
10 a survey of advertisers before, right?

11           MR. SHEANIN: Asked and answered.

12           THE WITNESS: That is correct.

13 BY MS. DEARBORN:

14           Q. Outside of your work on this case, had  
15 you ever heard of Advertiser Perceptions before?

16           A. You mean the firm?

17           Q. Yes.

18           A. No.

19           Q. So the first time you heard of Advertiser  
20 Perceptions was in connection with this  
21 litigation?

22           A. That's correct.

1       respondents for a situation like this, when you  
2       want to survey advertisers.

3           Q. Okay. Did you do anything yourself to  
4       test the quality of the Advertiser Perceptions  
5       AdPROs panel?

6           A. I didn't have the -- I did not do  
7       anything specifically, but there wasn't data in  
8       the report for me -- to allow me to do that.

9           Q. But you didn't talk to anyone in  
10      Advertiser Perceptions, for example?

11           A. No, I did not.

12           Q. Did you do any research into  
13      Advertiser Perceptions apart from what is in  
14      Dr. Simonson's report?

15           A. No, I did not.

16           Q. Okay. Did you do any investigation  
17      yourself to ascertain the quality of  
18      Advertiser Perceptions' methodology for assembling  
19      a panel?

20           A. No, because it wasn't germane to my  
21      opinion. My opinion was more on the result of  
22      what they did than what was in the report.